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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SAGE HUMPHRIES, GINA MENICHINO,
ROSEMARIE DeANGELO, DANIELLE
GUTIERREZ, JANE DOE 100, JULIET
DOHERTY, and JANE DOE 200

Case Number: 2:21-cv-01412-APG-VCF

Plaintiffs,

vs.

MITCHELL TAYLOR BUTTON and
DUSTY BUTTON,

Defendants.

SECOND AMENDED COMPLAINT
JURY DEMAND

Plaintiffs Sage Humphries, Gina Menichino, RoseMarie (“Rosie”) DeAngelo, Danielle
Gutierrez, Jane Doe 100, Juliet Doherty, and Jane Doe 200 (together, “Plaintiffs”), for their

Complaint against Defendants Mitchell Taylor Button (“Taylor Button”) and Dusty Button (together, “Defendants” or “the Buttons”), allege as follows:

INTRODUCTION

1. This Second Amended Complaint is filed with the consent of Defendants pursuant to Federal Rule of Civil Procedure 15(a)(2). *See* ECF No. 34.

2. This case is about a couple who has exploited their position of power and influence in the dance world to sexually abuse young dancers across the country.

3. Young dancers are uniquely susceptible to sexual abuse. Dance training is characterized by physical intimacy and unequal power dynamics between students and teachers, which helps contribute to a pattern of exploitation and silence.

4. A culture of harassment and abuse permeates the dance world at all levels, including the most prestigious dance institutions. Wendy Whelan, a former ballerina for the New York City Ballet, has observed, “[i]t can feel particularly risky — both emotionally and career wise — to be a whistle-blower within our field . . . We aren’t encouraged to use our voice to expose the dark side of what is also truly a magical industry for the sake of hurting our father-figure teachers.”

5. Another former ballerina, Alexandra Waterbury, told the New York Times, “[e]very time I see a little girl in a tutu or with her hair in a bun on her way to ballet class, all I can think is that she should run in the other direction, because no one will protect her, like no one protected me.”

6. Taylor Button and his wife, Dusty Button (together, “the Buttons”), are well-known members of the dance community who have been perpetuating this legacy of exploitation by inflicting an intentional combination of emotional control, financial manipulation, and sexual abuse against young dancers across the country since as early as 2007, when Taylor Button began abusing underage dancers as a dance instructor in Florida.

7. As alleged further herein, the Buttons abuse their positions of power and prestige in the dance community to garner the loyalty and trust of young dancers. The Buttons then exploit those relationships to coerce sexual acts by means of force and fraud.

1 27. Taylor forcefully performed oral sex on that minor child and forced her to
2 perform oral sex on him. Among other tactics, Taylor used his position of power and authority
3 over that child to force her to comply with his sexual demands. For instance, Taylor would
4 reward that child with special professional opportunities—including traveling to out-of-state
5 dance conventions—to reward her obedience. Conversely, Taylor would retaliate against that
6 child and threaten to hurt her dance career if she refused his advances.

7 28. Gina Menichino took dance lessons from Taylor.

8 29. Gina and other Centerstage students looked up to Taylor because he was a
9 talented dance instructor and well-connected in the dance industry.

10 30. Taylor took a special interest in Gina and would single her out for special
11 attention and opportunities in dance class, such as allowing her to assistant teach his dance
12 classes.

13 31. Taylor required all students to wear only sports bras and “booty shorts” to his
14 dance classes. Taylor would compliment Gina’s body and appearance. Taylor also became
15 physically affectionate with Gina.

16 32. Gina aspired to dance professionally, and she was flattered that Taylor took an
17 interest and saw potential in her. Taylor promised that if she trusted him and followed his
18 direction, he would help her become a successful dancer.

19 33. Taylor made special efforts to isolate Gina and confine her in spaces which he
20 controlled. For example, Taylor scheduled rehearsals for Gina’s dance solos to be late at night
21 when no one else was in the dance studio.

22 34. During one such rehearsal, Taylor cornered Gina in a private dance studio and
23 kissed her.

24 35. Taylor socialized with many of his students outside of dance class.

25 36. On one such occasion in 2010, when Gina was 13 years old, Taylor was watching
26 a movie with several of his dance students, including Gina.

27 37. Gina and Taylor sat on the couch sharing a blanket. Taylor then touched Gina’s
28 leg and eventually began rubbing her vagina without her consent.

1 38. Later that evening, in a further effort to groom Gina for abuse, Taylor and Gina
2 exchanged text messages. Taylor told Gina that when he touched her he could feel she was
3 “wet” and that he wanted to touch her again.

4 39. On a second occasion in 2010, when Gina was 13 years old, Gina and Taylor
5 were again watching a movie with other girls from the dance studio and sharing a blanket.
6 Taylor again began rubbing Gina’s vagina and penetrated her with his hand. Taylor then
7 grabbed Gina’s hand and forced her to touch his penis.

8 40. On another occasion, Taylor texted Gina a photo of himself with no shirt on,
9 flexing his muscles in the mirror. Taylor coerced Gina into sending him photos of herself
10 without clothes on.

11 41. Taylor soon began regularly “sexting” Gina. Taylor would send Gina photos
12 and videos of himself masturbating. Taylor instructed Gina to do the same, thus soliciting visual
13 depictions of Gina engaging in sexually explicit conduct as defined by federal child
14 pornography laws.

15 42. In these texts, Taylor would tell Gina, in great detail, about sexual acts he wanted
16 to perform on her, including wanting to “tie her up.” Taylor instructed Gina to do the same.

17 43. Taylor instructed Gina to change his contact in her phone to a fake name and to
18 delete all of their text exchanges every night.

19 44. Taylor regularly traveled out-of-state for dance conventions, classes, and
20 competitions, including to Virginia and North Carolina. When Taylor traveled out-of-state,
21 Taylor would continue to communicate with Gina, including by sending and soliciting sexually
22 explicit photos and videos.

23 45. Taylor used his position of power and authority over Gina to force her to comply
24 with his sexual demands. For example, Taylor would reward Gina’s compliance by singling
25 her out for professional opportunities, such as free, special solo practices and an assistant
26 teaching position at a dance convention. These opportunities were invaluable to Gina because
27 she aspired to be a professional dancer.

46. Taylor would also give Gina gifts to reward her for submitting to his demands. For example, on Gina's 14th birthday, Taylor gave Gina a teddy bear, which he sprayed with his cologne so that Gina could feel like she was "sleeping" with Taylor. On another occasion, Taylor gave Gina a clothing gift that he purchased from an out-of-state dance convention.

47. Conversely, if Gina resisted Taylor's advances, Taylor would retaliate against Gina with emotional abuse and/or by threatening to hurt her dance career.

48. Over time, Taylor became increasingly controlling. For example, Taylor instructed Gina to isolate herself from her family and from certain friends, he exerted control over Gina's text messages and social media posts, and he instructed Gina how to dress and style her hair outside of dance class.

49. Gina has expended significant costs on therapy and suffers mental anguish, severe emotional distress, and loss of enjoyment of life as a direct and proximate result of Taylor's abuse.

50. Gina turned 18 years old July 29, 2014.

II. Taylor Manipulated and Sexually Abused Another Student, Rosie DeAngelo.

51. Rosie also took dance lessons from Taylor at Centerstage Dance Academy when she was a minor.

52. Taylor was physically affectionate toward Rosie and would single her out for special attention. For example, Taylor would insist on taking Rosie on one-on-one lunch breaks from the dance studio, and he would find opportunities to caress Rosie or hold her hand when they were in private.

53. Rosie aspired to be a professional dancer. Given Taylor's purported connections in the dance industry and his status as her dance instructor, Taylor's approval and professional support were invaluable to Rosie.

54. Taylor began to make sexual comments toward Rosie. For example, Taylor choreographed a solo dance performance for Rosie where she used a stool as a prop, and Taylor told Rosie that he wanted to "bend her over" the stool and perform sexual acts on her.

1 55. Taylor conditioned attention and support in dance class on Rosie's obedience
2 with his sexually suggestive behavior.

3 56. If Rosie defied Taylor's wishes or expressed discomfort with his comments and
4 conduct, Taylor would retaliate against Rosie by, for example, refusing to speak to her, yelling
5 at her in dance class, or moving her to the back of the stage for dance performances.

6 57. Taylor would make sexual jokes in dance class, such as pantomiming sexual
7 conduct while dancing, and if Rosie and the other dancers did not laugh, he would attempt to
8 publicly embarrass them by, for instance, calling them "prude."

9 58. Taylor would travel out-of-state for various professional dance opportunities,
10 and he would continuously keep in contact with Rosie while traveling via cellphone and other
11 means of electronic communication.

12 59. Rosie attended social gatherings with other dancers where Taylor was present.

13 60. On one such occasion, around 2007 when Rosie was a minor, Rosie attended a
14 sleepover at a fellow dancer's house. Taylor was present during the sleepover.

15 61. Throughout the sleepover, Taylor would be physically affectionate with the
16 young dancers. For example, he encouraged the young dancers to lay in bed and cuddle with
17 him.

18 62. At one point, Taylor insisted that Rosie enter a private bedroom and lay on the
19 bed with him. Taylor closed the door, trapping Rosie in the room with him.

20 63. Taylor then began kissing Rosie, touching Rosie's chest under her shirt, and
21 rubbing Rosie's vagina without her consent. Taylor also forced Rosie to touch his penis.

22 64. Taylor instructed Rosie not to tell anyone, including her mother, about his
23 comments and behavior that were sexual in nature.

24 65. Taylor told Rosie that it was not illegal for him to perform sexual acts on her
25 because of the size of their age difference. Taylor made this intentionally false statement to a
26 minor in order to keep Rosie silent about the abuse. Taylor convinced Rosie she had no legal
27 recourse for the abuse she suffered.

1 66. The shock and confusion resulting from the abuse, coupled with Taylor's
2 authoritative demands, threats for secrecy, and manipulative assertions that his conduct was
3 legal led Rosie to suppress the abuse and remain silent about Taylor's conduct.

4 67. Rosie did not report the sexual abuse or pursue legal remedies until the original
5 complaint was filed in this action as a direct and proximate result of Taylor's control, deception,
6 manipulation, and threats, and the affirmative steps that he took during the abuse in order to
7 prevent her from reporting his misconduct.

8 68. Accordingly, any statute of limitations applicable to Rosie's claims, if any, is
9 tolled. Taylor's actions described above deprived Rosie of the opportunity to commence this
10 lawsuit before now.

11 69. Taylor is equitably estopped from asserting a statute of limitations defense as to
12 Rosie's claims. Allowing Taylor to do so would be unjust. Taylor took active steps to prevent
13 Rosie from commencing this lawsuit before now, including by intentionally lying to Rosie about
14 the applicable law governing his conduct, willfully causing her to believe that she had no legal
15 recourse against him.

16 70. Due to her fear of Taylor, Rosie switched to a different dance studio her senior
17 year of high school.

18 71. Rosie has expended significant costs on therapy and suffers mental anguish,
19 severe emotional distress, and loss of enjoyment of life as a direct and proximate result of
20 Taylor's abuse.

21 **III. Taylor Battered and Sexually Abused Another Student, Danielle Gutierrez.**

22 72. Danielle also took dance lessons from Taylor at Centerstage Dance Academy.

23 73. Taylor would be physically affectionate toward Danielle and single her out for
24 special attention. For example, Taylor would often cuddle, caress, and hug Danielle, and Taylor
25 told Danielle he saw her as his "little sister."

26 74. Danielle aspired to dance professionally, so she valued Taylor's approval and
27 mentorship.

1 75. Around 2007, when Danielle was 17 years old, Taylor began to make explicitly
2 sexual comments toward Danielle. For example, Taylor regularly told Danielle that he wanted
3 to “take her virginity.” On one occasion, Taylor hugged Danielle and then groped her breasts.

4 76. Taylor’s behavior made Danielle uncomfortable, particularly given his status as
5 her dance instructor.

6 77. Taylor conditioned his professional and emotional support for Danielle on
7 Danielle’s obedience with his romantic and sexual advances.

8 78. Taylor became increasingly controlling over Danielle. For example, Taylor
9 would become enraged if Danielle did not immediately respond to his text messages, and Taylor
10 forbid Danielle from spending time with school friends who were not affiliated with the dance
11 studio. Taylor would also instruct Danielle how to dress, and he attempted to isolate Danielle
12 from her family.

13 79. If Danielle defied Taylor’s demands, Taylor would threaten to harm Danielle’s
14 professional dance career. For example, Taylor would threaten to kick Danielle out of dances,
15 threaten to kick Danielle out of the dance studio, and would tell Danielle she would never make
16 it as a professional dancer.

17 80. The evening of Danielle’s school dance, when Danielle was 17 years old and
18 Taylor was an adult, Taylor forced Danielle to leave early and have sex with him. Taylor
19 coerced Danielle into sex through intimidation, emotional abuse, and by exploiting their
20 unequal power dynamic.

21 81. Throughout the course of their relationship, Taylor would regularly travel out-
22 of-state for dance competitions and conventions, and he would continuously text and talk to
23 Danielle, including by sending verbally and mentally abusive messages.

24 82. Danielle considered attending college out-of-state, but Taylor forced Danielle to
25 attend college in Tampa, Florida so that she would remain close to him.

26 83. Taylor became increasingly controlling. For example, Taylor forbid Danielle
27 from participating in her college dance program because he did not want her to dance with other
28

1 men. Taylor would also instruct Danielle how to dress, and would regularly go through her
2 phone to monitor her texts and phone calls.

3 84. Taylor also became verbally abusive toward Danielle and regularly called her
4 names, including Hispanic slurs.

5 85. On one occasion, during Danielle's freshman year of college, Danielle and
6 Taylor got into an argument. Taylor became enraged and dragged Danielle across the room by
7 her hair.

8 86. From that point forward, Taylor physically abused Danielle at least three times
9 a week, including by punching and kicking Danielle in the stomach, and squeezing Danielle
10 until she could not breathe and her nose bled.

11 87. On one occasion, Taylor and Danielle got into an argument in Taylor's apartment
12 and Danielle tried to escape. Taylor then pinned Danielle against the wall and told her she could
13 not leave, trapping her in his apartment. Taylor pulled out a knife and put it to Danielle's throat.

14 88. Taylor also put the knife against his own throat and wrist and told Danielle he
15 would kill himself and Danielle's family in front of Danielle if she ever tried to leave him.

16 89. Throughout their relationship, Taylor would coerce sex from Danielle through
17 intimidation, emotional manipulation, and verbal abuse. For example, Taylor would tell
18 Danielle that if she did not have sex with him, he would revoke his offers of professional
19 opportunities, and she would never succeed in her career as a dancer.

20 90. On another occasion, Taylor pulled an AK-47 on another man in front of
21 Danielle. This experience intensified Danielle's fear of Taylor.

22 91. Taylor would regularly yell at Danielle and call her names in public, and on
23 several occasions, bystanders attempted to intervene to help Danielle. Taylor would become
24 belligerent and scare away these bystanders, which deepened Danielle's fear of Taylor and
25 belief that no one could help.

26 92. Taylor and Danielle traveled together out-of-state, including to California to
27 teach at a dance studio together. During this trip, Taylor continued his pattern of abusive
28 conduct.

1 93. Taylor told Danielle that his conduct toward her was not illegal due to the size
2 of their age difference. Taylor made this intentionally false statement in order to keep Danielle
3 silent about the abuse. Taylor convinced Danielle she had no legal recourse for the abuse she
4 suffered.

5 94. Taylor also threatened to kill Danielle and her family if she ever came forward
6 about his conduct.

7 95. The trauma resulting from the abuse, coupled with Taylor's violent threats
8 demanding secrecy, led Danielle to suppress the abuse and remain silent about Taylor's conduct.

9 96. Danielle did not report the sexual and physical abuse until August 2018 as a
10 direct and proximate result of Taylor's control, deception, manipulation, and threats, and the
11 affirmative steps that he took during the abuse in order to prevent her from reporting his
12 misconduct.

13 97. Accordingly, any statute of limitations applicable to Danielle's claims, if any, is
14 tolled. Taylor's actions described above deprived Danielle of the opportunity to commence this
15 lawsuit before now.

16 98. Taylor is equitably estopped from asserting a statute of limitations defense as to
17 Danielle's claims. Allowing Taylor to do so would be unjust. Taylor took active steps to
18 prevent Danielle from commencing this lawsuit before now, including by making violent threats
19 to harm her or her family and to ruin her career aimed at silencing her. Taylor also actively and
20 intentionally lied to Danielle about the applicable law governing his conduct, willfully causing
21 her to believe that she had no legal recourse against him.

22 99. During Danielle's sophomore year of college, Taylor broke up with Danielle.

23 100. Danielle has expended significant costs on therapy and suffers mental anguish,
24 severe emotional distress, and loss of enjoyment of life as a direct and proximate result of
25 Taylor's abuse.

26 **IV. Taylor Isolated and Molested Another Student, Jane Doe 200.**

27 101. Jane Doe 200 also took dance lessons from Taylor at Centerstage.
28

1 102. Taylor would single Jane Doe 200 out for special attention in dance class,
2 including by giving her teaching opportunities. Taylor was also physically affectionate with
3 Jane Doe 200 and would regularly give her long hugs.

4 103. Taylor told Jane Doe 200 that he would mentor her and open doors for her so
5 that she could achieve professional success in the dance industry. Taylor told Jane Doe 200 he
6 had important connections in the dance world, and he would help make her a star.

7 104. Jane Doe 200 aspired to dance professionally, so Taylor's promises of
8 mentorship and professional support were invaluable to her.

9 105. Taylor would consistently text Jane Doe 200, including when he traveled out-
10 of-state. His texting soon became flirtatious, and he would send Jane Doe 200 messages that
11 said things like, "I miss you" or "I wish I could see you." Taylor would then instruct Jane Doe
12 200 to delete their texts.

13 106. Taylor's relationship with Jane Doe 200 intensified. Taylor became emotionally
14 manipulative, including by oversharing personal trauma with Jane Doe 200 and encouraging
15 her to do the same.

16 107. Taylor regularly socialized with students outside of dance class, including
17 attending group sleepovers at the home of another minor Centerstage dancer.

18 108. At one such occasion around 2006, when Jane Doe 200 was a minor, several
19 Centerstage dancers were having a sleepover and began watching a scary moving in the living
20 room.

21 109. Jane Doe 200 did not like scary movies, so she left the living room to go to sleep
22 in an upstairs bedroom.

23 110. Taylor soon followed Jane Doe 200 up to the bedroom and laid next to her,
24 trapping her in the bedroom.

25 111. Taylor began forcefully kissing Jane Doe 200. Taylor repeatedly instructed Jane
26 Doe 200 to open her mouth so that he could shove his tongue in her mouth.

27 112. Taylor then began rubbing Jane Doe 200's vagina and penetrated her with his
28 hand.

1 113. Jane Doe 200 felt frozen and afraid.

2 114. Eventually, one of the other dancers began walking up the stairs toward the
3 bedroom. Taylor quickly rolled off the bed onto a pull-out mattress that was on the floor and
4 pretended to be asleep.

5 115. The dancer told Jane Doe 200 that the other girls had turned off the scary movie
6 and invited her to come back down stairs. Jane Doe 200 accepted and escaped.

7 116. Taylor became angry that Jane Doe 200 left the bedroom. Taylor instructed Jane
8 Doe 200 not to tell anyone about the sexual acts he forcefully performed on her.

9 117. Taylor told Jane Doe 200 that it was not illegal for him to perform sexual acts
10 on her because of the size of their age difference. Taylor made this intentionally false statement
11 to a minor in order to keep Jane Doe 200 silent about the abuse. Taylor convinced Jane Doe
12 200 she had no legal recourse for the abuse she suffered.

13 118. Taylor's special attention and professional support were conditioned on Jane
14 Doe 200 obeying his demands. Because Jane Doe 200 stopped the sexual assault from
15 progressing further, Taylor began treating Jane Doe 200 harshly in dance class, often yelling at
16 her or ignoring her entirely.

17 119. On one occasion, one of Jane Doe 200's male friends stopped by Centerstage to
18 say hello to Jane Doe 200. Taylor became furious and began screaming at Jane Doe 200 and
19 calling her a slut.

20 120. Taylor instructed the other students at Centerstage to stop speaking to Jane Doe
21 200. The other dancers were Jane Doe 200's closest friends for many years. Taylor isolated
22 Jane Doe 200 from her support network.

23 121. Jane Doe 200 began to observe Taylor behaving inappropriately with other
24 dancers at Centerstage. For example, at one dance competition, Jane Doe 200 observed Taylor
25 cuddling with multiple minor dancers in a hotel bed. On another occasion, Jane Doe 200 saw
26 a minor dancer enter Taylor's car late at night by herself.

27 122. Taylor also forced the dancers to wear only sports bras and booty shorts to class,
28 and he would yell at them and force them to do push-ups if they ever tried to cover their bodies.

1 123. Jane Doe 200 suspected that Taylor was manipulating and sexually abusing other
2 dancers and that made Jane Doe 200 feel even more fearful of Taylor. Jane Doe 200 told the
3 studio owner that she thought Taylor treated the dancers inappropriately and singled certain
4 dancers out for “special attention.”

5 124. The studio owner organized a meeting with Taylor and Jane Doe 200. Taylor
6 screamed at Jane Doe 200 and said that she was causing problems because she was jealous.

7 125. Taylor told faculty members of other dance studios and organizations that Jane
8 Doe 200 was crazy and they should not work with her.

9 126. Jane Doe 200 felt helpless. She felt Taylor had control over her friendships and
10 professional dance career, and she felt powerless to stop him from manipulating and molesting
11 other dancers.

12 127. The shock and confusion resulting from the abuse, coupled with Taylor’s
13 authoritative demands, threats for secrecy, and manipulative assertions that his conduct was
14 legal led Jane Doe 200 to suppress the abuse and remain silent about Taylor’s conduct.

15 128. Jane Doe 200 did not report the sexual abuse or pursue legal remedies until the
16 amended complaint was filed in this action as a direct and proximate result of Taylor’s control,
17 deception, manipulation, and threats, and the affirmative steps that he took during the abuse in
18 order to prevent her from reporting his misconduct.

19 129. Accordingly, any statute of limitations applicable to Jane Doe 200’s claims, if
20 any, is tolled. Taylor’s actions described above deprived Jane Doe 200 of the opportunity to
21 commence this lawsuit before now.

22 130. Taylor is equitably estopped from asserting a statute of limitations defense as to
23 Jane Doe 200’s claims. Allowing Taylor to do so would be unjust. Taylor took active steps to
24 prevent Jane Doe 200 from commencing this lawsuit before now, including by intentionally
25 lying to Jane Doe 200 about the applicable law governing his conduct, willfully causing her to
26 believe that she had no legal recourse against him.

131. Jane Doe 200 has expended significant costs on therapy and suffers mental anguish, severe emotional distress, and loss of enjoyment of life as a direct and proximate result of Taylor's abuse.

V. **Dusty Button and Taylor Button Work Together to Carry out a Campaign of Harassment and Abuse.**

132. In December 2010, Centerstage dancers and their parents began to discuss Taylor's behavior and the rumors that he had physically abused students and engaged in sexual relationships with minors.

133. Taylor fled to London, England.

134. Taylor told his former students that he was moving because he wanted to marry his former girlfriend, Dusty Button, who was a student at the Royal Ballet School in London at the time.

135. Shortly thereafter, Taylor married Dusty and took her last name.

136. Dusty is a prominent figure in the dance community. Dusty has over 300,000 followers on Instagram, and she has been featured in Glamour Magazine, Pointe Magazine, Dance Europe, Dance Spirit Magazine, Dance Magazine, Dance Informa, and other dance publications. She is sponsored by Red Bull, Bloch Dancewear, and Discount Dance.

137. Taylor holds himself out to be Dusty's manager.

138. The Buttons work together providing, *inter alia*, career management, choreography, photography, and dance instruction services. They have created a brand for themselves called "Button Built" and sell branded merchandise online.

139. A substantial portion of this work involves interacting with minors. For instance, the Buttons have been affiliated with the Showstopper, BellaMoxi, and Radix dance conventions and competitions.

140. The Buttons exploit their proximity to and authority over minors to groom and abuse young dancers.

141. For example, in 2015 the Buttons began a so-called "mentorship" relationship with an 11-year-old child under the pretense that they would help further her dance career. Over

1 the course of approximately three years, the Buttons became emotionally manipulative and
2 controlling over the minor child's life. For instance, the Buttons pressured the child to travel
3 and share a bed with them, insisted on exercising control over her social media accounts,
4 instructed her to dress and behave in a manner similar to Dusty, and, on one occasion, Dusty
5 insisted on performing a lengthy touching session on the child, which she called a "massage."
6 The Buttons also attempted to isolate the child from her family, including by telling the child
7 that her mother is unable to advance her dance career, and that she should live with the Buttons
8 as their adopted daughter instead. If the child or her mother defied the Buttons' wishes, the
9 Buttons would emotionally abuse the child and threaten to cease assisting her in pursuing her
10 professional dance aspirations.

11 **VI. The Buttons Groomed and Raped Jane Doe 100.**

12 142. Jane Doe 100 met the Buttons in 2014 when she was a minor.

13 143. At the time, Dusty was a ballerina with the Boston Ballet. Jane Doe 100 danced
14 for Urbanity Dance, a contemporary dance company, which rented studio space from the Boston
15 Ballet for rehearsals and classes. On several occasions, Dusty observed Jane Doe 100's dance
16 classes.

17 144. One day after Jane Doe 100's dance class, Dusty approached Jane Doe 100.
18 Dusty complimented Jane Doe 100's dancing and told Jane Doe 100 she had enormous
19 potential.

20 145. Jane Doe 100 knew that Dusty was a dancer with the Boston Ballet and that
21 Dusty had a large social media following. Jane Doe 100 was flattered and excited that a dancer
22 as successful and famous as Dusty recognized Jane Doe 100's talent.

23 146. Thereafter, Dusty continued to initiate conversations with Jane Doe 100 and
24 compliment her dancing, thus garnering Jane Doe 100's loyalty and trust.

25 147. Dusty told Jane Doe 100 that she should meet Dusty's husband, Taylor. Dusty
26 said that Taylor managed Dusty's career and social media accounts, and that he could make
27 Jane Doe 100 a star.

1 148. Jane Doe 100 met Dusty and Taylor for coffee. The Buttons told Jane Doe 100
2 that if she continued to spend time with them and follow their directions, they would help Jane
3 Doe 100 achieve her dream of becoming a professional dancer. The Buttons promised to help
4 Jane Doe 100 network in the dance industry, grow her social media following, attend prestigious
5 dance conventions, and access other professional opportunities. These promises of professional
6 mentorship, opportunity, and support were invaluable to Jane Doe 100.

7 149. After coffee, the Buttons instructed Jane Doe 100 to come to the Buttons'
8 apartment. There, the Buttons insisted that Jane Doe 100 drink alcohol. Jane Doe 100 became
9 intoxicated.

10 150. One evening, when Jane Doe 100 was a minor and the Buttons were adults, the
11 Buttons invited Jane Doe 100 to party with them in Boston. The Buttons forced Jane Doe 100
12 to drink alcohol.

13 151. Jane Doe 100 soon became incapacitated and felt she did not have control over
14 her body. Jane Doe 100 believes she was drugged by the Buttons.

15 152. The Buttons then brought Jane Doe 100 back to their apartment. They led Jane
16 Doe 100 into a room that had a mattress on the floor and an arsenal of guns hanging on the wall.
17 The Buttons pushed Jane Doe 100 onto the mattress.

18 153. Dusty began kissing Jane Doe 100 and touching Jane Doe 100's body in a sexual
19 manner. Dusty held Jane Doe 100 down while Taylor performed oral sex on Jane Doe 100.
20 Jane Doe 100 began to cry and told the Buttons to stop.

21 154. Dusty continued to restrain Jane Doe 100, and Taylor forcibly penetrated Jane
22 Doe 100. Jane Doe 100 said "no" and "stop."

23 155. Dusty held up her phone in a manner that indicated to Jane Doe 100 she was
24 recording the rape. Jane Doe 100 believes Dusty took photos and/or videos of Taylor raping
25 Jane Doe 100.

26 156. At one point, Dusty had a gun in her hand. Jane Doe 100 was terrified.
27
28

1 157. In the years following the rape, Jane Doe 100 has experienced panic attacks,
2 suicidal thoughts, and an eating disorder. Jane Doe 100 has ceased pursuing a professional
3 dance career.

4 158. Jane Doe 100 has expended significant costs on therapy and suffers mental
5 anguish, severe emotional distress, deprivation of income and benefits, damage to her
6 reputation and career, and loss of enjoyment of life as a direct and proximate result of the
7 Buttons' abuse.

8 **VII. The Buttons Manipulated and Brutalized Sage Humphries.**

9 159. Sage met Dusty in 2016 when they were both dancing for the Boston Ballet. At
10 the time, Sage was a dancer for Boston Ballet II, which is an apprenticeship program. Dusty
11 was a principal ballerina, which is the highest position for a dancer in the Boston Ballet.

12 160. Sage also met Taylor through the Boston Ballet. Taylor would regularly spend
13 time at the dance studio to watch Dusty and the other dancers rehearse.

14 161. Sage met the Buttons at a vulnerable period in her life. Sage was new to Boston
15 and did not have family or friends in the area. Unlike many other dancers in the Boston Ballet,
16 she did not come from a prominent ballet school and did not have any personal connections to
17 the professional dance community.

18 162. Around February 2017, Dusty initiated a friendship with Sage and invited her to
19 come to the Buttons' apartment after rehearsal. Sage was eager to develop a friendship with
20 Dusty given Dusty's status in the Boston Ballet and in the dance world, and especially given
21 Sage's lack of other friends in Boston.

22 163. Dusty urged Sage to develop a friendship with Taylor.

23 164. Sage soon began regularly spending time with the Buttons.

24 165. The Buttons' behavior became increasingly controlling. For instance, the
25 Buttons would insist that Sage drink heavily when she was with them.

26 166. The Buttons also began to insist that Sage sleep at their apartment on a regular
27 basis.

1 167. The Buttons instructed Sage to wear their clothes and style her hair to match
2 Dusty's hair.

3 168. Taylor told Sage that if she allowed him to control her social media, he could
4 make her famous like Dusty. Taylor insisted on having Sage's passwords, including access to
5 her text messages and emails.

6 169. Taylor helped grow Sage's social media following. Taylor told Sage that he
7 would be able to continue to help her career only if he had full control over her accounts. Taylor
8 took over Sage's posts, text messages, and emails.

9 170. One evening, Taylor placed a mattress in the living room and insisted that Sage
10 and the Buttons all lay on it and watch a movie, with Taylor laying in the middle. At some
11 point, Dusty pretended to fall asleep. Taylor then rolled over and began to sexually assault
12 Sage.

13 171. The Buttons threatened Sage that the only way Sage could develop her dancing,
14 singing, and acting career was if she continued to be affiliated with the Buttons. The Buttons
15 told Sage if she did not obey the Buttons' demands, she would never succeed professionally.

16 172. The Buttons required that Sage regularly sleep at the Buttons' apartment, and
17 Taylor continued to sexually assault Sage.

18 173. Any time Sage attempted to develop other friendships and spend time apart from
19 the Buttons, the Buttons would become enraged. On one occasion, Sage went to lunch with a
20 group of women. When Sage returned to the Buttons' apartment, Taylor began screaming at
21 her. Sage feared for her safety. Taylor then forced Sage to perform oral sex on him. Sage was
22 terrified.

23 174. The Buttons continued to forbid Sage from developing other friendships, and
24 they forbid Sage from speaking with her family.

25 175. At one point, Sage had plans to travel to California to spend time with her family.
26 The Buttons became extremely angry at the prospect of Sage spending time away from them.
27 The Buttons told Sage that she must prioritize them over her family, otherwise they would ruin
28

1 her dance career. The Buttons then went with Sage to California so she could not be alone with
2 her family.

3 176. One day in California, the Buttons insisted that they leave Sage's parent's house
4 to go to Sage's family beach house. Sage's parents protested because they had not seen Sage
5 in a long time and wanted to spend time with her. The Buttons then verbally abused Sage and
6 threatened her career success.

7 177. Sage took the Buttons to the beach house. There, Dusty began kissing Sage, and
8 Taylor soon joined. They told Sage, "this is what you want, we can finally be together." Sage
9 felt terrified and like the Buttons had complete control over her life.

10 178. When they returned to Boston, the abuse intensified. One evening, Sage went
11 to the Buttons' apartment after rehearsal, and the apartment was completely dark. Dusty and
12 Taylor demanded that Sage put on a spandex suit that covered her entire body, including her
13 mouth and eyes, and left only her nose and ears exposed. Dusty led Sage into a room of the
14 Buttons' apartment that had an arsenal of guns hanging on the wall.

15 179. Sage told the Buttons she was scared. They instructed her to lie down on a table,
16 and they tied up her arms and legs so she was unable to move. The Buttons then sexually
17 assaulted Sage.

18 180. Sage began sobbing and screaming, begging the Buttons to untie her. The
19 Buttons told her she was being weak and stupid.

20 181. Soon thereafter, Dusty and Taylor forced Sage to have sexual intercourse with
21 Taylor. Dusty watched, and Sage cried the entire time.

22 182. After that, the Buttons began having sex with Sage whenever they pleased.
23 Sometimes Taylor would penetrate Sage while she was sleeping.

24 183. Taylor regularly shoved Sage to the ground or on the bed and violently
25 penetrated her without her consent.

26 184. On several occasions, Dusty held Sage down while Taylor penetrated her so that
27 Sage could not move.

1 185. During sex, the Buttons would choke, slap, and pull Sage's hair. Sage was often
2 left covered in bruises.

3 186. The Buttons also regularly used painful sex toys on Sage and would tie Sage up
4 in order to have sex with her.

5 187. Sage never consented to these violent sex acts.

6 188. By May 2017, the Buttons forced Sage to live with them full time, and she
7 became financially dependent on them. The Buttons did not charge Sage for rent, and they paid
8 for her meals and other personal expenses in exchange for her compliance with their abuse.
9 They continued to control her social media accounts and conversations with others.

10 189. Taylor told Dusty she was not allowed to sexually abuse Sage unless he were
11 also present.

12 190. On one occasion, Taylor discovered Dusty sexually abused Sage without him
13 present, and he began to scream. Dusty and Taylor engaged in a physical altercation, ending
14 with Taylor striking Dusty across the face.

15 191. This experience intensified Sage's fear of the Buttons.

16 192. If Sage ever attempted to distance herself or disobey the Buttons, they would
17 threaten to revoke their financial support and sabotage her career.

18 193. The Buttons told Sage she was not allowed to speak to her parents without their
19 permission.

20 194. Sage's family became concerned with the lack of communication and thought
21 that Sage was in a dangerous situation. Sage's family flew to Boston and forced Sage to return
22 with them to California.

23 195. Once in California, the Buttons continued to contact Sage. On one occasion,
24 Taylor told Sage via Snapchat that he wanted to throw her in his van, tie her hands and feet,
25 blindfold her, rent a warehouse, hang her from the ceiling, rape Sage, "and leave [her] there to
26 die."

27 196. Taylor also threatened to break into Sage's family's home, slit her dad and ex-
28 boyfriend's throats, and beat up her mother.

1 197. At the end of July 2017, Taylor and Dusty traveled to California, causing Sage
2 extreme fear.

3 198. In August 2017, Sage sought and received abuse protection orders against both
4 Taylor and Dusty.

5 199. Sage and her family expended significant costs on psychological treatment and
6 attorneys' fees.

7 200. Sage suffered and continues to suffer physical pain, mental anguish, and severe
8 emotional distress as a direct and proximate result of the Buttons' abuse.

9 **VIII. The Buttons Drugged and Molested Juliet Doherty.**

10 201. Juliet met the Buttons in 2018 when Juliet and Dusty were both invited to
11 perform at the Panama Ballet Festival ("the Festival").

12 202. Juliet had heard of Dusty and knew that Dusty was a well-known, successful
13 dancer.

14 203. Throughout the Festival, the Buttons bonded with Juliet. The Buttons
15 encouraged Juliet to share personal details about her life with them. Dusty told Juliet that she
16 felt like Juliet's "big sister." Juliet trusted the Buttons and shared confidences with them.

17 204. At the end of the Festival, the Buttons asked Juliet to remain in Panama with
18 them to explore the country. The Buttons told Juliet that she should share a hotel room with
19 them.

20 205. At one point, the Buttons showed Juliet photos of a room full of guns that the
21 Buttons had at their house.

22 206. The Buttons also emphasized their power in the dance world and spoke
23 negatively about their enemies in the dance community. The Buttons suggested that they had
24 the ability to negatively impact individuals' dance careers.

25 207. Juliet felt intimidated by the Buttons.

26 208. After a few days, Juliet wanted to return to the United States. The Buttons
27 pressured Juliet to remain in Panama.

1 209. One evening in Panama, Juliet and the Buttons went to the hotel pool. The
2 Buttons made Juliet a drink.

3 210. Juliet soon felt incapacitated and like she did not have control over her body.
4 Juliet believes she was drugged by the Buttons.

5 211. While in the pool, Dusty began rubbing Juliet's vagina without her consent.
6 Dusty then penetrated Juliet with her hand.

7 212. Juliet felt overwhelmed and scared. Juliet attempted to escape the pool, but she
8 lost control of her body and fell. This fall caused Juliet to suffer extensive bruises and scrapes
9 on her leg.

10 213. Juliet then went to a nearby bathroom and began vomiting.

11 214. Juliet then went to the hotel room. Juliet locked herself in the bathroom and
12 continued vomiting. The Buttons repeatedly knocked on the bathroom door and told Juliet to
13 let them in, but Juliet kept the door locked because she did not feel safe with the Buttons.

14 215. Juliet then passed out on the bathroom floor.

15 216. When Juliet woke up, she was in bed in a towel lying next to Dusty. Taylor was
16 also present in the room with Juliet that night.

17 217. Juliet left Panama and returned to the U.S. later that day.

18 218. Juliet fell into a deep depression after the abuse.

19 219. The trauma resulting from the abuse, coupled with Juliet's fear of physical and
20 professional retaliation, led Juliet to suppress the abuse and remain silent about Dusty's
21 conduct.

22 220. Juliet did not report the abuse until now as a direct and proximate result of the
23 Buttons' manipulation and intimidation, and the affirmative steps that they took during the
24 abuse in order to prevent Juliet from reporting their misconduct.

25 221. Accordingly, any statute of limitations applicable to Juliet's claims, if any, is
26 tolled. The Buttons' actions described above deprived Juliet of the opportunity to commence
27 this lawsuit before now.

222. Dusty is equitably estopped from asserting a statute of limitations defense as to Juliet's claims. Allowing Dusty to do so would be unjust. The Buttons took active steps to prevent Juliet from commencing this lawsuit before now, including by drugging and intimidating her in an effort to control and silence her.

223. Juliet has expended significant costs on therapy and suffers mental anguish, severe emotional distress, deprivation of income and benefits, damage to her reputation and career, and loss of enjoyment of life as a direct and proximate result of Dusty's abuse.

FIRST CAUSE OF ACTION

Violation of 18 U.S.C. § 1591, 1595(a) – Sex Trafficking (*Sage Humphries Against Defendants*)

224. Plaintiff Sage Humphries incorporates each and every allegation contained above as though fully set forth herein.

225. The Buttons recruited and enticed Sage to begin a sexual and/or professional relationship with them based on the false promise that they would aid her career and professional development.

226. The Buttons acted knowing that they would use force, threats of force, and/or fraud to cause Sage to engage in sex acts in exchange for commercial gain and advantage.

227. The Buttons in fact used force, threats of force, and/or fraud to cause Sage to engage in sex acts for commercial gain and advantage.

228. In exchange for performing sex acts, the Buttons gave Sage professional opportunities, and/or management services, and/or photography services, and/or gifts and other forms of financial support.

229. The Buttons' conduct affected interstate commerce, including, but not limited to, because the Buttons enticed Sage to cross state lines with the Buttons by using threats, intimidation, and the pretense that they would help further her career and professional development, in exchange for engaging in sex acts.

230. As result of the Buttons' conduct, Sage suffered damages including deprivation of income and benefits, loss of employment opportunities, severe physical and emotional

1 distress, pain and suffering, mental anguish, humiliation, loss of enjoyment of life, and damage
2 to her reputation and career.

3 231. The Buttons' unlawful and discriminatory actions were intentional, done with
4 malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Sage's rights.

5 232. Sage claims compensatory and punitive damages herein.

6 233. The amount of damages sought herein exceeds the jurisdictional limits of all
7 other courts which would otherwise have jurisdiction.

8 **SECOND CAUSE OF ACTION**

9 **Violation of 18 U.S.C. § 1589, 1595(a) – Forced Labor**
10 ***(Sage Humphries Against Defendants)***

11 234. Plaintiff Sage Humphries incorporates each and every allegation contained
12 above as though fully set forth herein.

13 235. The Buttons obtained Sage's labor and services, including, but not limited to,
14 Sage's sexual labor and services, by means of force, threats of force, physical restraint, and
15 threats of physical restraint.

16 236. The Buttons obtained Sage's labor and services, including, but not limited to,
17 Sage's sexual labor and services, by inflicting serious harm and threatening serious harm to
18 Sage and/or her family. These harms and threatened harms include, but are not limited to,
19 physical, psychological, financial, and reputational harms.

20 237. The Buttons obtained Sage's labor and services, including, but not limited to,
21 Sage's sexual labor and services, by means of a scheme, plan, or pattern intended to cause Sage
22 to believe that, if Sage did not perform such labor or services, Sage or her family would suffer
23 serious harm or physical restraint. These harms and threatened harms include, but are not
24 limited to, physical, psychological, financial, and reputational harms.

25 238. As result of the Buttons' conduct, Sage suffered damages including deprivation
26 of income and benefits, loss of employment opportunities, severe physical and emotional
27 distress, pain and suffering, mental anguish, humiliation, loss of enjoyment of life, and damage
28 to her reputation and career.

1 239. The Buttons' unlawful and discriminatory actions were intentional, done with
2 malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Sage's rights.

3 240. Sage claims compensatory and punitive damages herein.

4 241. The amount of damages sought herein exceeds the jurisdictional limits of all
5 other courts which would otherwise have jurisdiction.

6 **THIRD CAUSE OF ACTION**

7 **Violation of 18 U.S.C. § 1584, 1595(a) – Involuntary Servitude**
8 ***(Sage Humphries Against the Buttons)***

9 242. Plaintiff Sage Humphries incorporates each and every allegation contained
10 above as though fully set forth herein.

11 243. The Buttons knowingly and willfully held Sage in involuntary servitude.

12 244. The Buttons held Sage in a condition of compulsory service whereby Sage was
13 compelled to provide labor and services against her will for the benefit of the Buttons. This
14 labor and service includes, but is not limited to, sexual labor and services.

15 245. The Buttons obtained Sage's labor and services, including, but not limited to,
16 Sage's sexual labor and services, by means of force, threats of force, physical restraint, and
17 threats of physical restraint.

18 246. The Buttons obtained Sage's labor and services, including, but not limited to,
19 Sage's sexual labor and services, by inflicting serious harm and threatening serious harm to
20 Sage and/or her family. These harms and threatened harms include, but are not limited to,
21 physical, psychological, financial, and reputational harms.

22 247. The Buttons obtained Sage's labor and services, including, but not limited to,
23 Sage's sexual labor and services, by means of a scheme, plan, or pattern intended to cause Sage
24 to believe that, if Sage did not perform such labor or services, Sage or her family would suffer
25 serious harm or physical restraint. These harms and threatened harms include, but are not
26 limited to, physical, psychological, financial, and reputational harms.

27 248. As a result of the Buttons' conduct, Sage suffered damages including deprivation
28 of income and benefits, loss of employment opportunities, severe physical and emotional

1 distress, pain and suffering, mental anguish, humiliation, loss of enjoyment of life, and damage
2 to her reputation and career.

3 249. The Buttons' unlawful and discriminatory actions were intentional, done with
4 malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Sage's rights.

5 250. Sage claims compensatory and punitive damages herein.

6 251. The amount of damages sought herein exceeds the jurisdictional limits of all
7 other courts which would otherwise have jurisdiction.

8 **FOURTH CAUSE OF ACTION**

9 **Violation of 18 U.S.C. § 1591, 1595(a) – Sex Trafficking**
10 ***(Gina Menichino Against Taylor Button)***

11 252. Plaintiff Gina Menichino incorporates each and every allegation contained
12 above as though fully set forth herein.

13 253. Taylor recruited and enticed Gina to engage in sex acts for commercial gain and
14 advantage while she was a minor.

15 254. Taylor recruited and enticed Gina to begin a sexual and/or professional
16 relationship with him based on the false promise that he would aid her career and professional
17 development.

18 255. Taylor acted knowing that he would use force, threats of force, and/or fraud to
19 cause Gina to engage in sex acts in exchange for commercial gain and advantage.

20 256. Taylor in fact used force, threats of force, and/or fraud to cause Gina to engage
21 in sex acts for commercial gain and advantage.

22 257. In exchange for performing sex acts, Taylor gave Gina professional
23 opportunities, and/or choreography services, and/or management services, and/or gifts and
24 other forms of financial support.

25 258. Taylor's conduct affected interstate commerce, including, but not limited to,
26 because Taylor enticed Gina to send visual depictions of Gina engaging in sexually explicit
27 conduct as defined by federal child pornography laws across state lines under the pretense that
28 he would help further her career and professional development.

SIXTH CAUSE OF ACTION

**Violation of 18 U.S.C. § 1584, 1595(a) – Involuntary Servitude
(*Gina Menichino Against Taylor Button*)**

269. Plaintiff Gina Menichino incorporates each and every allegation contained above as though fully set forth herein.

270. Taylor knowingly and willfully held Gina in involuntary servitude.

271. Taylor held Gina in a condition of compulsory service whereby Gina was compelled to provide labor and services against her will for the benefit of Taylor. This labor and service includes, but is not limited to, sexual labor and services.

272. Taylor obtained Gina's labor and services, including, but not limited to, Gina's sexual labor and services, by inflicting serious harm and threatening serious harm to Gina. These harms and threatened harms include, but are not limited to, physical, psychological, financial, and reputational harms.

273. Taylor obtained Gina's labor and services, including, but not limited to, Gina's sexual labor and services, by means of a scheme, plan, or pattern intended to cause Gina to believe that, if Gina did not perform such labor or services, Gina or her family would suffer serious harm or physical restraint. These harms and threatened harms include, but are not limited to, physical, psychological, financial, and reputational harms.

274. As result of Taylor's conduct, Gina suffered damages including deprivation of income and benefits, loss of employment opportunities, severe physical and emotional distress, pain and suffering, mental anguish, humiliation, loss of enjoyment of life, and damage to her reputation and career.

275. Taylor's unlawful and discriminatory actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Gina's rights.

276. Gina claims compensatory and punitive damages herein.

277. The amount of damages sought herein exceeds the jurisdictional limits of all other courts which would otherwise have jurisdiction.

SEVENTH CAUSE OF ACTION

BATTERY

(Gina Menichino Against Taylor)

278. Plaintiff Gina Menichino incorporates each and every allegation contained above as though fully set forth herein.

279. Taylor intended to commit and committed acts of unwanted contact with Gina.

280. Taylor committed unwanted contact with Gina in a harmful and offensive manner, including but not limited to by inflicting juvenile sexual abuse against Gina.

281. Among other batteries, Taylor sexually abused Gina without her consent, without equality, and as a result of coercion.

282. Taylor exploited his position of authority to intimidate, overwhelm, and subdue Gina. Any objections to his conduct were met with retaliation.

283. Taylor abused his position of power and authority over Gina, who was in no position to reject his sexual advances due to her age and vulnerability.

284. Taylor's batteries on Gina caused physical injury, severe mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

285. Taylor's unlawful actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Gina's rights.

286. Gina claims compensatory and punitive damages herein.

287. The amount of damages sought herein exceeds the jurisdictional limits of all other courts which would otherwise have jurisdiction.

EIGHTH CAUSE OF ACTION

ASSAULT

(Gina Menichino Against Taylor Button)

288. Plaintiff Gina Menichino incorporates each and every allegation contained above as though fully set forth herein.

289. Taylor intentionally attempted, threatened, and committed harmful and offensive contacts against Gina, including but not limited to inflicting juvenile sexual abuse against Gina.

TENTH CAUSE OF ACTION

**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(*Gina Menichino Against Taylor Button*)**

305. Plaintiff Gina Menichino incorporates each and every allegation contained above as though fully set forth herein.

306. Taylor's conduct was extreme and outrageous and intentionally caused severe emotional distress to Gina.

307. Taylor's conduct exceeded all possible bounds of decency.

308. Taylor acted with the intent and knowledge that Gina suffered emotional distress due to his coercive conduct.

309. Taylor's conduct caused Gina to suffer physical injury, severe mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

310. Taylor's unlawful actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Gina's rights.

311. Gina claims compensatory and punitive damages herein.

312. The amount of damages sought herein exceeds the jurisdictional limits of all other courts which would otherwise have jurisdiction.

ELEVENTH CAUSE OF ACTION

**BREACH OF FIDUCIARY DUTY
(*Gina Menichino Against Taylor Button*)**

313. Plaintiff Gina Menichino incorporates each and every allegation contained above as though fully set forth herein.

314. Taylor and Gina's relationship was confidential and fiduciary in nature.

315. Taylor assumed control and responsibility of Gina. Taylor utilized the special, teacher-student relationship to gain Gina's trust, and to exert superiority and influence over Gina.

316. Gina in fact placed trust, confidence, and reliance on Taylor.

317. Taylor owed Gina fiduciary duties.

1 318. Taylor breached his fiduciary duties, including but not limited to by inflicting
2 juvenile sexual abuse against Gina, and by soliciting sexually explicit images and photos of
3 Gina.

4 319. Taylor's conduct proximately caused Gina to suffer physical injury, severe
5 mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of
6 life.

7 320. Taylor's unlawful actions were intentional, done with malice, and/or showed a
8 deliberate, willful, wanton, and reckless indifference to Gina's rights.

9 321. Gina claims compensatory and punitive damages herein.

10 322. The amount of damages sought herein exceeds the jurisdictional limits of all
11 other courts which would otherwise have jurisdiction.

12 **TWELFTH CAUSE OF ACTION**

13 **VIOLATION OF 18 U.S.C. §§ 2255, 2252 – Sexual Exploitation of a Minor**
14 ***(Gina Menichino Against Taylor Button)***

15 323. Plaintiff Gina Menichino incorporates each and every allegation contained
16 above as though fully set forth herein.

17 324. Taylor knowingly solicited, promoted, viewed, possessed, received, and/or
18 transported sexually explicit images and videos of Gina.

19 325. Taylor used, persuaded, induced, and/or enticed Gina to send him photos and
20 videos that included the lascivious exhibition of her genitalia and pubic areas and included
21 images of herself engaging in sexually explicit conduct including touching herself sexually and
22 simulating sexual intercourse.

23 326. Taylor intended for Gina to engage in the sexually explicit conduct he requested
24 her to photograph or video-record.

25 327. Gina was a minor at all relevant times.

26 328. Taylor took these actions knowing that Gina was a minor.

27 329. Gina sent the images and videos in response to Taylor's demands.
28

1 330. The images and videos were of Gina as a minor and were visual depictions of
2 Gina engaging in sexually explicit conduct as defined by federal child pornography laws.

3 331. The images and videos were sent using a means of interstate commerce and/or
4 had been shipped or transported in or affecting interstate commerce.

5 332. Taylor's conduct caused physical injury, severe mental and emotional distress,
6 pain and suffering, mental anguish, and loss of enjoyment of life.

7 333. Taylor's unlawful actions were intentional, done with malice, and/or showed a
8 deliberate, willful, wanton, and reckless indifference to Gina's rights.

9 334. Gina seeks all available relief including claiming compensatory and punitive
10 damages herein.

11 335. The amount of damages sought herein exceeds the jurisdictional limits of all
12 other courts which would otherwise have jurisdiction.

13 **THIRTEENTH CAUSE OF ACTION**

14 **Violation of 18 U.S.C. § 1591, 1595(a) – Sex Trafficking**
15 ***(Danielle Gutierrez Against Taylor Button)***

16 336. Plaintiff Danielle Gutierrez incorporates each and every allegation contained
17 above as though fully set forth herein.

18 337. Taylor recruited and enticed Danielle to engage in sex acts for commercial gain
19 and advantage while she was a minor.

20 338. Taylor recruited and enticed Danielle to begin a sexual and/or professional
21 relationship with him based on the false promise that he would aid her career and professional
22 development.

23 339. Taylor acted knowing that he would use force, threats of force, and/or fraud to
24 cause Danielle to engage in sex acts in exchange for commercial gain and advantage.

25 340. Taylor in fact used force, threats of force, and/or fraud to cause Danielle to
26 engage in sex acts for commercial gain and advantage.

1 341. In exchange for performing sex acts, Taylor gave Danielle professional
2 opportunities, and/or management services, and/or photography services, and/or gifts and other
3 forms of financial support.

4 342. Taylor's conduct affected interstate commerce, including, but not limited to,
5 because Taylor communicated with Danielle across state lines, and enticed Danielle to cross
6 state lines, by using threats, intimidation, and the pretense that he would help further her career
7 and professional development, in exchange for engaging in sex acts.

8 343. As result of Taylor's conduct, Danielle suffered damages including deprivation
9 of income and benefits, loss of employment opportunities, severe physical and emotional
10 distress, pain and suffering, mental anguish, humiliation, loss of enjoyment of life, and damage
11 to her reputation and career.

12 344. Taylor's unlawful and discriminatory actions were intentional, done with malice,
13 and/or showed a deliberate, willful, wanton, and reckless indifference to Danielle's rights.

14 345. Danielle claims compensatory and punitive damages herein.

15 346. The amount of damages sought herein exceeds the jurisdictional limits of all
16 other courts which would otherwise have jurisdiction.

17 **FOURTEENTH CAUSE OF ACTION**

18 **Violation of 18 U.S.C. § 1589, 1595(a) – Forced Labor**
19 ***(Danielle Gutierrez Against Taylor Button)***

20 347. Plaintiff Danielle Gutierrez incorporates each and every allegation contained
21 above as though fully set forth herein.

22 348. Taylor obtained Danielle's labor and services, including, but not limited to,
23 Danielle's sexual labor and services, by means of force, threats of force, physical restraint, and
24 threats of physical restraint.

25 349. Taylor obtained Danielle's labor and services, including, but not limited to,
26 Danielle's sexual labor and services, by inflicting serious harm and threatening serious harm to
27 Danielle and/or her family. These harms and threatened harms include, but are not limited to,
28 physical, psychological, financial, and reputational harms.

1 350. Taylor obtained Danielle's labor and services, including, but not limited to,
2 Danielle's sexual labor and services, by means of a scheme, plan, or pattern intended to cause
3 Danielle to believe that, if Danielle did not perform such labor or services, Danielle or her
4 family would suffer serious harm or physical restraint. These harms and threatened harms
5 include, but are not limited to, physical, psychological, financial, and reputational harms.

6 351. As result of Taylor's conduct, Danielle suffered damages including deprivation
7 of income and benefits, loss of employment opportunities, severe physical and emotional
8 distress, pain and suffering, mental anguish, humiliation, loss of enjoyment of life, and damage
9 to her reputation and career.

10 352. Taylor's unlawful and discriminatory actions were intentional, done with malice,
11 and/or showed a deliberate, willful, wanton, and reckless indifference to Danielle's rights.

12 353. Danielle claims compensatory and punitive damages herein.

13 354. The amount of damages sought herein exceeds the jurisdictional limits of all
14 other courts which would otherwise have jurisdiction.

15 **FIFTEENTH CAUSE OF ACTION**

16 **Violation of 18 U.S.C. § 1584, 1595(a) – Involuntary Servitude**

17 ***(Danielle Gutierrez Against Taylor Button)***

18 355. Plaintiff Danielle Gutierrez incorporates each and every allegation contained
19 above as though fully set forth herein.

20 356. Taylor knowingly and willfully held Danielle in involuntary servitude.

21 357. Taylor held Danielle in a condition of compulsory service whereby Danielle was
22 compelled to provide labor and services against her will for the benefit of Taylor. This labor
23 and service includes, but is not limited to, sexual labor and services.

24 358. Taylor obtained Danielle's labor and services, including, but not limited to,
25 Danielle's sexual labor and services, by means of force, threats of force, physical restraint, and
26 threats of physical restraint.

27 359. Taylor obtained Danielle's labor and services, including, but not limited to,
28 Danielle's sexual labor and services, by inflicting serious harm and threatening serious harm to

1 Danielle and/or her family. These harms and threatened harms include, but are not limited to,
2 physical, psychological, financial, and reputational harms.

3 360. Taylor obtained Danielle's labor and services, including, but not limited to,
4 Danielle's sexual labor and services, by means of a scheme, plan, or pattern intended to cause
5 Danielle to believe that, if Danielle did not perform such labor or services, Danielle or her
6 family would suffer serious harm or physical restraint. These harms and threatened harms
7 include, but are not limited to, physical, psychological, financial, and reputational harms.

8 361. As result of Taylor's conduct, Danielle suffered damages including deprivation
9 of income and benefits, loss of employment opportunities, severe physical and emotional
10 distress, pain and suffering, mental anguish, humiliation, loss of enjoyment of life, and damage
11 to her reputation and career.

12 362. Taylor's unlawful and discriminatory actions were intentional, done with malice,
13 and/or showed a deliberate, willful, wanton, and reckless indifference to Danielle's rights.

14 363. Danielle claims compensatory and punitive damages herein.

15 364. The amount of damages sought herein exceeds the jurisdictional limits of all
16 other courts which would otherwise have jurisdiction.

17 **SIXTEENTH CAUSE OF ACTION**

18 **BATTERY**

19 ***(Danielle Gutierrez Against Taylor)***

20 365. Plaintiff Danielle Gutierrez incorporates each and every allegation contained
21 above as though fully set forth herein.

22 366. Taylor intended to commit and committed acts of unwanted contact with
23 Danielle.

24 367. Taylor committed unwanted contact with Danielle in a harmful and offensive
25 manner, including but not limited to by inflicting juvenile sexual abuse against Danielle, and
26 by physically abusing Danielle by, among other tactics, punching, kicking, and squeezing
27 Danielle.
28

1 368. Among other batteries, Taylor sexually and physically abused Danielle without
2 her consent, without equality, and as a result of coercion.

3 369. Taylor used physical force and threats of physical force to commit batteries
4 against Danielle.

5 370. Taylor exploited his position of authority to intimidate, overwhelm, and subdue
6 Danielle. Any objections to his conduct were met with retaliation.

7 371. Taylor abused his position of power and authority over Danielle, who was in no
8 position to reject his sexual advances due to her age and vulnerability.

9 372. Taylor's batteries on Danielle caused physical injury, severe mental and
10 emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

11 373. Taylor's unlawful actions were intentional, done with malice, and/or showed a
12 deliberate, willful, wanton, and reckless indifference to Danielle's rights.

13 374. Danielle claims compensatory and punitive damages herein.

14 375. The amount of damages sought herein exceeds the jurisdictional limits of all
15 other courts which would otherwise have jurisdiction.

16 **SEVENTEENTH CAUSE OF ACTION**

17 **ASSAULT**

18 ***(Danielle Gutierrez Against Taylor Button)***

19 376. Plaintiff Danielle Gutierrez incorporates each and every allegation contained
20 above as though fully set forth herein.

21 377. Taylor intentionally attempted, threatened, and committed harmful and offensive
22 contacts against Danielle, including but not limited to inflicting juvenile sexual abuse and
23 physical abuse against Danielle.

24 378. Taylor's conduct placed Danielle in reasonable apprehension of bodily harm.

25 379. Taylor's assaults on Danielle caused physical injury, severe mental and
26 emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

27 380. Taylor's unlawful actions were intentional, done with malice, and/or showed a
28 deliberate, willful, wanton, and reckless indifference to Danielle's rights.

1 381. Danielle claims compensatory and punitive damages herein.

2 382. The amount of damages sought herein exceeds the jurisdictional limits of all
3 other courts which would otherwise have jurisdiction.

4 **EIGHTEENTH CAUSE OF ACTION**

5 **FALSE IMPRISONMENT**
6 ***(Danielle Gutierrez Against Taylor Button)***

7 383. Plaintiff Danielle Gutierrez incorporates each and every allegation contained
8 above as though fully set forth herein.

9 384. Taylor intentionally confined Danielle, including but not limited to trapping her
10 in his apartment through physical force and threats of physical force.

11 385. Taylor used physical power and an unequal power dynamic to intimidate,
12 overwhelm, and subdue Danielle. Any objections to his conduct were met with retaliation.

13 386. Taylor abused his position of power and authority over Danielle, who was in no
14 position to reject his sexual advances due to her age and vulnerability.

15 387. Danielle was conscious of the confinement.

16 388. Danielle did not consent to the confinement.

17 389. Taylor's conduct caused Danielle to suffer physical injury, severe mental and
18 emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

19 390. Taylor's unlawful actions were intentional, done with malice, and/or showed a
20 deliberate, willful, wanton, and reckless indifference to Danielle's rights.

21 391. Danielle claims compensatory and punitive damages herein.

22 392. The amount of damages sought herein exceeds the jurisdictional limits of all
23 other courts which would otherwise have jurisdiction.

24 **NINETEENTH CAUSE OF ACTION**

25 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
26 ***(Danielle Gutierrez Against Taylor Button)***

27 393. Plaintiff Danielle Gutierrez incorporates each and every allegation contained
28 above as though fully set forth herein.

1 394. Taylor's conduct was extreme and outrageous and intentionally caused severe
2 emotional distress to Danielle.

3 395. Taylor's conduct exceeded all possible bounds of decency.

4 396. Taylor acted with the intent and knowledge that Danielle suffered emotional
5 distress due to his coercive and violent conduct.

6 397. Taylor's conduct caused Danielle to suffer physical injury, severe mental and
7 emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

8 398. Taylor's unlawful actions were intentional, done with malice, and/or showed a
9 deliberate, willful, wanton, and reckless indifference to Danielle's rights.

10 399. Danielle claims compensatory and punitive damages herein.

11 400. The amount of damages sought herein exceeds the jurisdictional limits of all
12 other courts which would otherwise have jurisdiction.

13 **TWENTIETH CAUSE OF ACTION**

14 **BREACH OF FIDUCIARY DUTY**
15 ***(Danielle Gutierrez Against Taylor Button)***

16 401. Plaintiff Danielle Gutierrez incorporates each and every allegation contained
17 above as though fully set forth herein.

18 402. Taylor and Danielle's relationship was confidential and fiduciary in nature.

19 403. Taylor assumed control and responsibility of Danielle. Taylor utilized the
20 special, teacher-student relationship to gain Danielle's trust, and to exert superiority and
21 influence over Danielle.

22 404. Danielle in fact placed trust, confidence, and reliance on Taylor.

23 405. Taylor owed Danielle fiduciary duties.

24 406. Taylor breached his fiduciary duties, including but not limited to by inflicting
25 juvenile sexual abuse and physical abuse against Danielle.

26 407. Taylor's conduct proximately caused Danielle to suffer physical injury, severe
27 mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of
28 life.

1 419. Taylor's unlawful and discriminatory actions were intentional, done with malice,
2 and/or showed a deliberate, willful, wanton, and reckless indifference to Rosie's rights.

3 420. Rosie claims compensatory and punitive damages herein.

4 421. The amount of damages sought herein exceeds the jurisdictional limits of all
5 other courts which would otherwise have jurisdiction.

6 **TWENTY-SECOND CAUSE OF ACTION**

7 **Violation of 18 U.S.C. § 1589, 1595(a) – Forced Labor**
8 ***(Rosie DeAngelo Against Taylor Button)***

9 422. Plaintiff Rosie DeAngelo incorporates each and every allegation contained
10 above as though fully set forth herein.

11 423. Taylor obtained Rosie's labor and services, including, but not limited to, Rosie's
12 sexual labor and services, by means of a scheme, plan, or pattern intended to cause Rosie to
13 believe that, if Rosie did not perform such labor or services, Rosie would suffer serious harm
14 or physical restraint. These harms and threatened harms include, but are not limited to, physical,
15 psychological, financial, and reputational harms.

16 424. As result of Taylor's conduct, Rosie suffered damages including deprivation of
17 income and benefits, loss of employment opportunities, severe physical and emotional distress,
18 pain and suffering, mental anguish, humiliation, loss of enjoyment of life, and damage to her
19 reputation and career.

20 425. Taylor's unlawful and discriminatory actions were intentional, done with malice,
21 and/or showed a deliberate, willful, wanton, and reckless indifference to Rosie's rights.

22 426. Rosie claims compensatory and punitive damages herein.

23 427. The amount of damages sought herein exceeds the jurisdictional limits of all
24 other courts which would otherwise have jurisdiction.

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TWENTY-THIRD CAUSE OF ACTION

**Violation of 18 U.S.C. § 1584, 1595(a) – Involuntary Servitude
(*Rosie DeAngelo Against Taylor Button*)**

428. Plaintiff Rosie DeAngelo incorporates each and every allegation contained above as though fully set forth herein.

429. Taylor knowingly and willfully held Rosie in involuntary servitude.

430. Taylor held Rosie in a condition of compulsory service whereby Rosie was compelled to provide labor and services against her will for the benefit of Taylor. This labor and service includes, but is not limited to, sexual labor and services.

431. Taylor obtained Rosie's labor and services, including, but not limited to, Rosie's sexual labor and services, by inflicting serious harm and threatening serious harm to Rosie. These harms and threatened harms include, but are not limited to, physical, psychological, financial, and reputational harms.

432. Taylor obtained Rosie's labor and services, including, but not limited to, Rosie's sexual labor and services, by means of a scheme, plan, or pattern intended to cause Rosie to believe that, if Rosie did not perform such labor or services, Rosie or her family would suffer serious harm or physical restraint. These harms and threatened harms include, but are not limited to, physical, psychological, financial, and reputational harms.

433. As result of Taylor's conduct, Rosie suffered damages including deprivation of income and benefits, loss of employment opportunities, severe physical and emotional distress, pain and suffering, mental anguish, humiliation, loss of enjoyment of life, and damage to her reputation and career.

434. Taylor's unlawful and discriminatory actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Rosie's rights.

435. Rosie claims compensatory and punitive damages herein.

436. The amount of damages sought herein exceeds the jurisdictional limits of all other courts which would otherwise have jurisdiction.

TWENTY-FOURTH CAUSE OF ACTION

BATTERY

(Rosie DeAngelo Against Taylor)

437. Plaintiff Rosie DeAngelo incorporates each and every allegation contained above as though fully set forth herein.

438. Taylor intended to commit and committed acts of unwanted contact with Rosie.

439. Taylor committed unwanted contact with Rosie in a harmful and offensive manner, including but not limited to by inflicting juvenile sexual abuse against Rosie.

440. Among other batteries, Taylor sexually abused Rosie without her consent, without equality, and as a result of coercion.

441. Taylor exploited his position of authority to intimidate, overwhelm, and subdue Rosie. Any objections to his conduct were met with retaliation.

442. Taylor abused his position of power and authority over Rosie, who was in no position to reject his sexual advances due to her age and vulnerability.

443. Taylor's batteries on Rosie caused physical injury, severe mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

444. Taylor's unlawful actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Rosie's rights.

445. Rosie claims compensatory and punitive damages herein.

446. The amount of damages sought herein exceeds the jurisdictional limits of all other courts which would otherwise have jurisdiction.

TWENTY-FIFTH CAUSE OF ACTION

ASSAULT

(Rosie DeAngelo Against Taylor Button)

447. Plaintiff Rosie DeAngelo incorporates each and every allegation contained above as though fully set forth herein.

1 448. Taylor intentionally attempted, threatened, and committed harmful and offensive
2 contacts against Rosie, including but not limited to inflicting juvenile sexual abuse against
3 Rosie.

4 449. Taylor's conduct placed Rosie in reasonable apprehension of bodily harm.

5 450. Taylor's assaults on Rosie caused physical injury, severe mental and emotional
6 distress, pain and suffering, mental anguish, and loss of enjoyment of life.

7 451. Taylor's unlawful actions were intentional, done with malice, and/or showed a
8 deliberate, willful, wanton, and reckless indifference to Rosie's rights.

9 452. Rosie claims compensatory and punitive damages herein.

10 453. The amount of damages sought herein exceeds the jurisdictional limits of all
11 other courts which would otherwise have jurisdiction.

12 **TWENTY-SIXTH CAUSE OF ACTION**

13 **FALSE IMPRISONMENT**
14 ***(Rosie DeAngelo Against Taylor Button)***

15 454. Plaintiff Rosie DeAngelo incorporates each and every allegation contained
16 above as though fully set forth herein.

17 455. Taylor intentionally confined Rosie, including but not limited to trapping her in
18 a bedroom in another student's home.

19 456. Taylor used physical power and an unequal power dynamic to intimidate,
20 overwhelm, and subdue Rosie. Any objections to his conduct were met with retaliation.

21 457. Taylor abused his position of power and authority over Rosie, who was in no
22 position to reject his sexual advances due to her age and vulnerability.

23 458. Rosie was conscious of the confinement.

24 459. Rosie did not consent to the confinement.

25 460. Taylor's conduct caused Rosie to suffer physical injury, severe mental and
26 emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

27 461. Taylor's unlawful actions were intentional, done with malice, and/or showed a
28 deliberate, willful, wanton, and reckless indifference to Rosie's rights.

1 462. Rosie claims compensatory and punitive damages herein.

2 463. The amount of damages sought herein exceeds the jurisdictional limits of all
3 other courts which would otherwise have jurisdiction.

4 **TWENTY-SEVENTH CAUSE OF ACTION**

5 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
6 ***(Rosie DeAngelo Against Taylor Button)***

7 464. Plaintiff Rosie DeAngelo incorporates each and every allegation contained
8 above as though fully set forth herein.

9 465. Taylor's conduct was extreme and outrageous and intentionally caused severe
10 emotional distress to Rosie.

11 466. Taylor's conduct exceeded all possible bounds of decency.

12 467. Taylor acted with the intent and knowledge that Rosie suffered emotional
13 distress due to his coercive conduct.

14 468. Taylor's conduct caused Rosie to suffer physical injury, severe mental and
15 emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

16 469. Taylor's unlawful actions were intentional, done with malice, and/or showed a
17 deliberate, willful, wanton, and reckless indifference to Rosie's rights.

18 470. Rosie claims compensatory and punitive damages herein.

19 471. The amount of damages sought herein exceeds the jurisdictional limits of all
20 other courts which would otherwise have jurisdiction.

21 **TWENTY-EIGHTH CAUSE OF ACTION**

22 **BREACH OF FIDUCIARY DUTY**
23 ***(Rosie DeAngelo Against Taylor Button)***

24 472. Plaintiff Rosie DeAngelo incorporates each and every allegation contained
25 above as though fully set forth herein.

26 473. Taylor and Rosie's relationship was confidential and fiduciary in nature.
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1 474. Taylor assumed control and responsibility of Rosie. Taylor utilized the special,
2 teacher-student relationship to gain Rosie's trust, and to exert superiority and influence over
3 Rosie.

4 475. Rosie in fact placed trust, confidence, and reliance on Taylor.

5 476. Taylor owed Rosie fiduciary duties.

6 477. Taylor breached his fiduciary duties, including but not limited to by inflicting
7 juvenile sexual abuse against Rosie.

8 478. Taylor's conduct proximately caused Rosie to suffer physical injury, severe
9 mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of
10 life.

11 479. Taylor's unlawful actions were intentional, done with malice, and/or showed a
12 deliberate, willful, wanton, and reckless indifference to Rosie's rights.

13 480. Rosie claims compensatory and punitive damages herein.

14 481. The amount of damages sought herein exceeds the jurisdictional limits of all
15 other courts which would otherwise have jurisdiction.

16 **TWENTY-NINTH CAUSE OF ACTION**

17 **Violation of 18 U.S.C. § 1591, 1595(a) – Sex Trafficking**
18 ***(Jane Doe 100 Against Defendants)***

19 482. Plaintiff Jane Doe 100 incorporates each and every allegation contained above
20 as though fully set forth herein.

21 483. The Buttons recruited and enticed Jane Doe 100 to engage in sex acts for
22 commercial gain and advantage while she was a minor.

23 484. The Buttons recruited and enticed Jane Doe 100 to begin a sexual and/or
24 professional relationship with them based on the false promise that they would aid her career
25 and professional development.

26 485. The Buttons acted knowing that they would use force, threats of force, and/or
27 fraud to cause Jane Doe 100 to engage in sex acts in exchange for commercial gain and
28 advantage.

1 threatened harms include, but are not limited to, physical, psychological, financial, and
2 reputational harms.

3 495. As result of the Buttons' conduct, Jane Doe 100 suffered damages including
4 deprivation of income and benefits, loss of employment opportunities, severe physical and
5 emotional distress, pain and suffering, mental anguish, humiliation, loss of enjoyment of life,
6 and damage to her reputation and career.

7 496. The Buttons' unlawful and discriminatory actions were intentional, done with
8 malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Jane Doe 100's
9 rights.

10 497. Jane Doe 100 claims compensatory and punitive damages herein.

11 498. The amount of damages sought herein exceeds the jurisdictional limits of all
12 other courts which would otherwise have jurisdiction.

13 **THIRTY-FIRST CAUSE OF ACTION**

14 **Violation of 18 U.S.C. § 1584, 1595(a) – Involuntary Servitude**
15 ***(Jane Doe 100 Against Defendants)***

16 499. Plaintiff Jane Doe 100 incorporates each and every allegation contained above
17 as though fully set forth herein.

18 500. The Buttons knowingly and willfully held Jane Doe 100 in involuntary
19 servitude.

20 501. The Buttons held Jane Doe 100 in a condition of compulsory service whereby
21 Jane Doe 100 was compelled to provide labor and services against her will for the benefit of
22 the Buttons. This labor and service includes, but is not limited to, sexual labor and services.

23 502. The Buttons obtained Jane Doe 100's labor and services, including, but not
24 limited to, Jane Doe 100's sexual labor and services, by inflicting serious harm and threatening
25 serious harm to Jane Doe 100. These harms and threatened harms include, but are not limited
26 to, physical, psychological, financial, and reputational harms.

27 503. The Buttons obtained Jane Doe 100's labor and services, including, but not
28 limited to, Jane Doe 100's sexual labor and services, by means of a scheme, plan, or pattern

1 intended to cause Jane Doe 100 to believe that, if Jane Doe 100 did not perform such labor or
2 services, Jane Doe 100 would suffer serious harm or physical restraint. These harms and
3 threatened harms include, but are not limited to, physical, psychological, financial, and
4 reputational harms.

5 504. As result of the Buttons' conduct, Jane Doe 100 suffered damages including
6 deprivation of income and benefits, loss of employment opportunities, severe physical and
7 emotional distress, pain and suffering, mental anguish, humiliation, loss of enjoyment of life,
8 and damage to her reputation and career.

9 505. The Buttons' unlawful and discriminatory actions were intentional, done with
10 malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Jane Doe 100's
11 rights.

12 506. Jane Doe 100 claims compensatory and punitive damages herein.

13 507. The amount of damages sought herein exceeds the jurisdictional limits of all
14 other courts which would otherwise have jurisdiction.

15 **THIRTY-SECOND CAUSE OF ACTION**

16 **BATTERY**

17 ***(Jane Doe 100 Against Defendants)***

18 508. Plaintiff Jane Doe 100 incorporates each and every allegation contained above
19 as though fully set forth herein.

20 509. The Buttons intended to commit and committed acts of unwanted contact with
21 Jane Doe 100.

22 510. The Buttons committed unwanted contact with Jane Doe 100 in a harmful and
23 offensive manner, including but not limited to by inflicting child sexual abuse against Jane Doe
24 100.

25 511. Among other batteries, the Buttons sexually abused Jane Doe 100 by means of
26 physical force and emotional intimidation.

27 512. The Buttons exploited their position of power and trust to overwhelm and subdue
28 Jane Doe 100.

THIRTY-FOURTH CAUSE OF ACTION

FALSE IMPRISONMENT
(Jane Doe 100 Against Defendants)

525. Plaintiff Jane Doe 100 incorporates each and every allegation contained above as though fully set forth herein.

526. The Buttons intentionally confined Jane Doe 100, including but not limited to trapping her in their apartment.

527. The Buttons used physical power, threats of force, an unequal power dynamic, and Jane Doe 100's incapacitation and vulnerability to intimidate, overwhelm, and subdue Jane Doe 100.

528. Jane Doe 100 was conscious of the confinement.

529. Jane Doe 100 did not consent to the confinement.

530. The Buttons' conduct caused Jane Doe 100 to suffer physical injury, severe mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

531. The Buttons' unlawful actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Jane Doe 100's rights.

532. Jane Doe 100 claims compensatory and punitive damages herein.

533. The amount of damages sought herein exceeds the jurisdictional limits of all other courts which would otherwise have jurisdiction.

THIRTY-FIFTH CAUSE OF ACTION

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(Jane Doe 100 Against Defendants)

534. Plaintiff Jane Doe 100 incorporates each and every allegation contained above as though fully set forth herein.

535. The Buttons' conduct was extreme and outrageous and intentionally caused severe emotional distress to Jane Doe 100.

536. The Buttons' conduct exceeded all possible bounds of decency.

1 562. The Buttons' unlawful actions were intentional, done with malice, and/or
2 showed a deliberate, willful, wanton, and reckless indifference to Jane Doe 100's rights.

3 563. Jane Doe 100 seeks all available relief including claiming compensatory and
4 punitive damages herein.

5 564. The amount of damages sought herein exceeds the jurisdictional limits of all
6 other courts which would otherwise have jurisdiction.

7 **THIRTY-EIGHTH CAUSE OF ACTION**

8 **Violation of 18 U.S.C. § 1591, 1595(a) – Sex Trafficking**
9 ***(Juliet Doherty Against Dusty Button)***

10 565. Plaintiff Juliet Doherty incorporates each and every allegation contained above
11 as though fully set forth herein.

12 566. Dusty recruited and enticed Juliet to begin a sexual and/or professional
13 relationship with her based on the false promise that she would provide professional and
14 personal mentorship, and/or aid her career and professional development.

15 567. Dusty acted knowing that she would use force, threats of force, and/or fraud to
16 cause Juliet to engage in sex acts in exchange for commercial gain and advantage.

17 568. Dusty in fact used force, threats of force, and/or fraud to cause Juliet to engage
18 in sex acts for commercial gain and advantage.

19 569. In exchange for performing sex acts, Dusty gave Juliet professional and personal
20 services and opportunities, and/or gifts and other forms of financial support.

21 570. Dusty's conduct affected interstate commerce, including, but not limited to,
22 because Dusty enticed Juliet to remain in a foreign country rather than return to the United
23 States by using intimidation and the pretense that she would help further Juliet's career and
24 professional development, in exchange for engaging in sex acts.

25 571. As result of Dusty's conduct, Juliet suffered damages including deprivation of
26 income and benefits, loss of employment opportunities, severe physical and emotional distress,
27 pain and suffering, mental anguish, humiliation, loss of enjoyment of life, and damage to her
28 reputation and career.

1 572. Dusty's unlawful and discriminatory actions were intentional, done with malice,
2 and/or showed a deliberate, willful, wanton, and reckless indifference to Juliet's rights.

3 573. Juliet claims compensatory and punitive damages herein.

4 574. The amount of damages sought herein exceeds the jurisdictional limits of all
5 other courts which would otherwise have jurisdiction.

6 **THIRTY-NINTH CAUSE OF ACTION**

7 **Violation of 18 U.S.C. § 1589, 1595(a) – Forced Labor**
8 ***(Juliet Doherty Against Dusty Button)***

9 575. Plaintiff Juliet Doherty incorporates each and every allegation contained above
10 as though fully set forth herein.

11 576. Dusty obtained Juliet's labor and services, including, but not limited to, Juliet's
12 sexual labor and services, by means of force, threats of force, physical restraint, and threats of
13 physical restraint.

14 577. Dusty obtained Juliet's labor and services, including, but not limited to, Juliet's
15 sexual labor and services, by inflicting serious harm and threatening serious harm. These harms
16 and threatened harms include, but are not limited to, physical, psychological, financial, and
17 reputational harms.

18 578. Dusty obtained Juliet's labor and services, including, but not limited to, Juliet's
19 sexual labor and services, by means of a scheme, plan, or pattern intended to cause Juliet to
20 believe that, if Juliet did not perform such labor or services, Juliet or would suffer serious harm
21 or physical restraint. These harms and threatened harms include, but are not limited to, physical,
22 psychological, financial, and reputational harms.

23 579. As result of Dusty's conduct, Juliet suffered damages including deprivation of
24 income and benefits, loss of employment opportunities, severe physical and emotional distress,
25 pain and suffering, mental anguish, humiliation, loss of enjoyment of life, and damage to her
26 reputation and career.

27 580. Dusty's unlawful and discriminatory actions were intentional, done with malice,
28 and/or showed a deliberate, willful, wanton, and reckless indifference to Juliet's rights.

1 581. Juliet claims compensatory and punitive damages herein.

2 582. The amount of damages sought herein exceeds the jurisdictional limits of all
3 other courts which would otherwise have jurisdiction.

4 **FORTIETH CAUSE OF ACTION**

5 **Violation of 18 U.S.C. § 1584, 1595(a) – Involuntary Servitude**
6 ***(Juliet Doherty Against Dusty Button)***

7 583. Plaintiff Juliet Doherty incorporates each and every allegation contained above
8 as though fully set forth herein.

9 584. Dusty knowingly and willfully held Juliet in involuntary servitude.

10 585. Dusty held Juliet in a condition of compulsory service whereby Juliet was
11 compelled to provide labor and services against her will for the benefit of Dusty. This labor
12 and service includes, but is not limited to, sexual labor and services.

13 586. Dusty obtained Juliet's labor and services, including, but not limited to, Juliet's
14 sexual labor and services, by means of force, threats of force, physical restraint, and threats of
15 physical restraint.

16 587. Dusty obtained Juliet's labor and services, including, but not limited to, Juliet's
17 sexual labor and services, by inflicting serious harm and threatening serious harm to Juliet.
18 These harms and threatened harms include, but are not limited to, physical, psychological,
19 financial, and reputational harms.

20 588. Dusty obtained Juliet's labor and services, including, but not limited to, Juliet's
21 sexual labor and services, by means of a scheme, plan, or pattern intended to cause Juliet to
22 believe that, if Juliet did not perform such labor or services, Juliet would suffer serious harm or
23 physical restraint. These harms and threatened harms include, but are not limited to, physical,
24 psychological, financial, and reputational harms.

25 589. As result of Dusty's conduct, Juliet suffered damages including deprivation of
26 income and benefits, loss of employment opportunities, severe physical and emotional distress,
27 pain and suffering, mental anguish, humiliation, loss of enjoyment of life, and damage to her
28 reputation and career.

1 590. Dusty's unlawful and discriminatory actions were intentional, done with malice,
2 and/or showed a deliberate, willful, wanton, and reckless indifference to Juliet's rights.

3 591. Juliet claims compensatory and punitive damages herein.

4 592. The amount of damages sought herein exceeds the jurisdictional limits of all
5 other courts which would otherwise have jurisdiction.

6 **FORTY-FIRST CAUSE OF ACTION**

7 **BATTERY**

8 ***(Juliet Doherty Against Dusty Button)***

9 593. Plaintiff Juliet Doherty incorporates each and every allegation contained above
10 as though fully set forth herein.

11 594. Dusty intended to commit and committed acts of unwanted contact with Juliet.

12 595. Dusty committed unwanted contact with Juliet in a harmful and offensive
13 manner, including but not limited to by inflicting sexual abuse against Juliet.

14 596. Among other batteries, Dusty sexually abused Juliet without her consent,
15 without equality, and as a result of coercion.

16 597. Dusty used physical force to commit batteries against Juliet.

17 598. Dusty exploited her position of power to intimidate, overwhelm, and subdue
18 Juliet.

19 599. Dusty abused her position of power over Juliet, who was in no position to reject
20 her sexual advances due to her incapacitation and vulnerability.

21 600. Dusty's batteries on Juliet caused physical injury, severe mental and emotional
22 distress, pain and suffering, mental anguish, and loss of enjoyment of life.

23 601. Dusty's unlawful actions were intentional, done with malice, and/or showed a
24 deliberate, willful, wanton, and reckless indifference to Juliet's rights.

25 602. Juliet claims compensatory and punitive damages herein.

26 603. The amount of damages sought herein exceeds the jurisdictional limits of all
27 other courts which would otherwise have jurisdiction.

FORTY-SECOND CAUSE OF ACTION

ASSAULT

(Juliet Doherty Against Dusty Button)

604. Plaintiff Juliet Doherty incorporates each and every allegation contained above as though fully set forth herein.

605. Dusty intentionally attempted, threatened, and committed harmful and offensive contacts against Juliet, including but not limited to inflicting juvenile sexual abuse and physical abuse against Juliet.

606. Dusty's conduct placed Juliet in reasonable apprehension of bodily harm.

607. Dusty's assaults on Juliet caused physical injury, severe mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

608. Dusty's unlawful actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Juliet's rights.

609. Juliet claims compensatory and punitive damages herein.

610. The amount of damages sought herein exceeds the jurisdictional limits of all other courts which would otherwise have jurisdiction.

FORTY-THIRD CAUSE OF ACTION

FALSE IMPRISONMENT

(Juliet Doherty Against Dusty Button)

611. Plaintiff Juliet Doherty incorporates each and every allegation contained above as though fully set forth herein.

612. Dusty intentionally confined Juliet, including but not limited to trapping her in a hotel pool through drugs, physical force, and threats of physical force.

613. Dusty used drugs, physical power, and an unequal power dynamic to intimidate, overwhelm, and subdue Juliet.

614. Dusty abused her position of power over Juliet, who was in no position to reject her sexual advances due to her incapacitation and vulnerability.

615. Juliet was conscious of the confinement.

616. Juliet did not consent to the confinement.

1 617. Dusty's conduct caused Juliet to suffer physical injury, severe mental and
2 emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

3 618. Dusty's unlawful actions were intentional, done with malice, and/or showed a
4 deliberate, willful, wanton, and reckless indifference to Juliet's rights.

5 619. Juliet claims compensatory and punitive damages herein.

6 620. The amount of damages sought herein exceeds the jurisdictional limits of all
7 other courts which would otherwise have jurisdiction.

8 **FORTY-FOURTH CAUSE OF ACTION**

9 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

10 *(Juliet Doherty Against Dusty Button)*

11 621. Plaintiff Juliet Doherty incorporates each and every allegation contained above
12 as though fully set forth herein.

13 622. Dusty's conduct was extreme and outrageous and intentionally caused severe
14 emotional distress to Juliet.

15 623. Dusty's conduct exceeded all possible bounds of decency.

16 624. Dusty acted with the intent and knowledge that Juliet suffered emotional distress
17 due to her coercive and abusive conduct.

18 625. Dusty's conduct caused Juliet to suffer physical injury, severe mental and
19 emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

20 626. Dusty's unlawful actions were intentional, done with malice, and/or showed a
21 deliberate, willful, wanton, and reckless indifference to Juliet's rights.

22 627. Juliet claims compensatory and punitive damages herein.

23 628. The amount of damages sought herein exceeds the jurisdictional limits of all
24 other courts which would otherwise have jurisdiction.

FORTY-FIFTH CAUSE OF ACTION

BREACH OF FIDUCIARY DUTY
(Juliet Doherty Against Dusty Button)

629. Plaintiff Juliet Doherty incorporates each and every allegation contained above as though fully set forth herein.

630. Dusty and Juliet's relationship was confidential and fiduciary in nature.

631. Dusty assumed control and responsibility of Juliet. Dusty utilized the special, mentor-mentee relationship to gain Juliet's trust, and to exert superiority and influence over Juliet.

632. Juliet in fact placed trust, confidence, and reliance on Dusty.

633. Dusty owed Juliet fiduciary duties.

634. Dusty breached her fiduciary duties, including but not limited to by inflicting sexual abuse against Juliet.

635. Dusty's conduct proximately caused Juliet to suffer physical injury, severe mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

636. Dusty's unlawful actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Juliet's rights.

637. Juliet claims compensatory and punitive damages herein.

638. The amount of damages sought herein exceeds the jurisdictional limits of all other courts which would otherwise have jurisdiction.

FORTY-SIXTH CAUSE OF ACTION

Violation of 18 U.S.C. § 1591, 1595(a) – Sex Trafficking
(Jane Doe 200 Against Taylor Button)

639. Plaintiff Jane Doe 200 incorporates each and every allegation contained above as though fully set forth herein.

640. Taylor recruited and enticed Jane Doe 200 to engage in sex acts for commercial gain and advantage while she was a minor.

1 641. Taylor recruited and enticed Jane Doe 200 to engage in sex acts with him based
2 on the false promise that he would aid her career and professional development.

3 642. Taylor acted knowing that he would use force, threats of force, and/or fraud to
4 cause Jane Doe 200 to engage in sex acts in exchange for commercial gain and advantage.

5 643. Taylor in fact used force, threats of force, and/or fraud to cause Jane Doe 200 to
6 engage in sex acts for commercial gain and advantage.

7 644. In exchange for performing sex acts, Taylor gave Jane Doe 200 professional
8 opportunities, and/or choreography services, and/or management services.

9 645. Taylor's conduct affected interstate commerce, including, but not limited to,
10 because Taylor enticed Jane Doe 200 to communicate with him in furtherance of their
11 relationship across state lines.

12 646. As result of Taylor's conduct, Jane Doe 200 suffered damages including
13 deprivation of income and benefits, loss of employment opportunities, severe physical and
14 emotional distress, pain and suffering, mental anguish, humiliation, loss of enjoyment of life,
15 and damage to her reputation and career.

16 647. Taylor's unlawful and discriminatory actions were intentional, done with malice,
17 and/or showed a deliberate, willful, wanton, and reckless indifference to Jane Doe 200's rights.

18 648. Jane Doe 200 claims compensatory and punitive damages herein.

19 649. The amount of damages sought herein exceeds the jurisdictional limits of all
20 other courts which would otherwise have jurisdiction.

21 **FORTY-SEVENTH CAUSE OF ACTION**

22 **Violation of 18 U.S.C. § 1589, 1595(a) – Forced Labor**
23 ***(Jane Doe 200 Against Taylor Button)***

24 650. Plaintiff Jane Doe 200 incorporates each and every allegation contained above
25 as though fully set forth herein.

26 651. Taylor obtained Jane Doe 200's labor and services, including, but not limited to,
27 Jane Doe 200's sexual labor and services, by means of a scheme, plan, or pattern intended to
28 cause Jane Doe 200 to believe that, if Jane Doe 200 did not perform such labor or services, Jane

1 Doe 200 would suffer serious harm or physical restraint. These harms and threatened harms
2 include, but are not limited to, physical, psychological, financial, and reputational harms.

3 652. As result of Taylor's conduct, Jane Doe 200 suffered damages including
4 deprivation of income and benefits, loss of employment opportunities, severe physical and
5 emotional distress, pain and suffering, mental anguish, humiliation, loss of enjoyment of life,
6 and damage to her reputation and career.

7 653. Taylor's unlawful and discriminatory actions were intentional, done with malice,
8 and/or showed a deliberate, willful, wanton, and reckless indifference to Jane Doe 200's rights.

9 654. Jane Doe 200 claims compensatory and punitive damages herein.

10 655. The amount of damages sought herein exceeds the jurisdictional limits of all
11 other courts which would otherwise have jurisdiction.

12 **FORTY-EIGHTH CAUSE OF ACTION**

13 **Violation of 18 U.S.C. § 1584, 1595(a) – Involuntary Servitude**
14 ***(Jane Doe 200 Against Taylor Button)***

15 656. Plaintiff Jane Doe 200 incorporates each and every allegation contained above
16 as though fully set forth herein.

17 657. Taylor knowingly and willfully held Jane Doe 200 in involuntary servitude.

18 658. Taylor held Jane Doe 200 in a condition of compulsory service whereby Jane
19 Doe 200 was compelled to provide labor and services against her will for the benefit of Taylor.
20 This labor and service includes, but is not limited to, sexual labor and services.

21 659. Taylor obtained Jane Doe 200's labor and services, including, but not limited to,
22 Jane Doe 200's sexual labor and services, by inflicting serious harm and threatening serious
23 harm to Jane Doe 200. These harms and threatened harms include, but are not limited to,
24 physical, psychological, financial, and reputational harms.

25 660. Taylor obtained Jane Doe 200's labor and services, including, but not limited to,
26 Jane Doe 200's sexual labor and services, by means of a scheme, plan, or pattern intended to
27 cause Jane Doe 200 to believe that, if Jane Doe 200 did not perform such labor or services, Jane
28 Doe 200 or her family would suffer serious harm or physical restraint. These harms and

1 threatened harms include, but are not limited to, physical, psychological, financial, and
2 reputational harms.

3 661. As result of Taylor's conduct, Jane Doe 200 suffered damages including
4 deprivation of income and benefits, loss of employment opportunities, severe physical and
5 emotional distress, pain and suffering, mental anguish, humiliation, loss of enjoyment of life,
6 and damage to her reputation and career.

7 662. Taylor's unlawful and discriminatory actions were intentional, done with malice,
8 and/or showed a deliberate, willful, wanton, and reckless indifference to Jane Doe 200's rights.

9 663. Jane Doe 200 claims compensatory and punitive damages herein.

10 664. The amount of damages sought herein exceeds the jurisdictional limits of all
11 other courts which would otherwise have jurisdiction.

12 **FORTY-NINTH CAUSE OF ACTION**

13 **BATTERY**

14 ***(Jane Doe 200 Against Taylor)***

15 665. Plaintiff Jane Doe 200 incorporates each and every allegation contained above
16 as though fully set forth herein.

17 666. Taylor intended to commit and committed acts of unwanted contact with Jane
18 Doe 200.

19 667. Taylor committed unwanted contact with Jane Doe 200 in a harmful and
20 offensive manner, including but not limited to by inflicting juvenile sexual abuse against Jane
21 Doe 200.

22 668. Among other batteries, Taylor sexually abused Jane Doe 200 without her
23 consent, without equality, and as a result of coercion.

24 669. Taylor exploited his position of authority to intimidate, overwhelm, and subdue
25 Jane Doe 200. Any objections to his conduct were met with retaliation.

26 670. Taylor abused his position of power and authority over Jane Doe 200, who was
27 in no position to reject his sexual advances due to her age and vulnerability.
28

671. Taylor's batteries on Jane Doe 200 caused physical injury, severe mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

672. Taylor's unlawful actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Jane Doe 200's rights.

673. Jane Doe 200 claims compensatory and punitive damages herein.

674. The amount of damages sought herein exceeds the jurisdictional limits of all other courts which would otherwise have jurisdiction.

FIFTIETH CAUSE OF ACTION

ASSAULT

(Jane Doe 200 Against Taylor Button)

675. Plaintiff Jane Doe 200 incorporates each and every allegation contained above as though fully set forth herein.

676. Taylor intentionally attempted, threatened, and committed harmful and offensive contacts against Jane Doe 200, including but not limited to inflicting juvenile sexual abuse against Jane Doe 200.

677. Taylor's conduct placed Jane Doe 200 in reasonable apprehension of bodily harm.

678. Taylor's assaults on Jane Doe 200 caused physical injury, severe mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

679. Taylor's unlawful actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Jane Doe 200's rights.

680. Jane Doe 200 claims compensatory and punitive damages herein.

681. The amount of damages sought herein exceeds the jurisdictional limits of all other courts which would otherwise have jurisdiction.

FIFTY-FIRST CAUSE OF ACTION

FALSE IMPRISONMENT
(Jane Doe 200 Against Taylor Button)

682. Plaintiff Jane Doe 200 incorporates each and every allegation contained above as though fully set forth herein.

683. Taylor intentionally confined Jane Doe 200, including but not limited to trapping her in a bedroom in another student's home.

684. Taylor used physical power and an unequal power dynamic to intimidate, overwhelm, and subdue Jane Doe 200. Any objections to his conduct were met with retaliation.

685. Taylor abused his position of power and authority over Jane Doe 200, who was in no position to reject his sexual advances due to her age and vulnerability.

686. Jane Doe 200 was conscious of the confinement.

687. Jane Doe 200 did not consent to the confinement.

688. Taylor's conduct caused Jane Doe 200 to suffer physical injury, severe mental and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

689. Taylor's unlawful actions were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Jane Doe 200's rights.

690. Jane Doe 200 claims compensatory and punitive damages herein.

691. The amount of damages sought herein exceeds the jurisdictional limits of all other courts which would otherwise have jurisdiction.

FIFTY-SECOND CAUSE OF ACTION

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(Jane Doe 200 Against Taylor Button)

692. Plaintiff Jane Doe 200 incorporates each and every allegation contained above as though fully set forth herein.

693. Taylor's conduct was extreme and outrageous and intentionally caused severe emotional distress to Jane Doe 200.

694. Taylor's conduct exceeded all possible bounds of decency.

708. Jane Doe 200 claims compensatory and punitive damages herein.

709. The amount of damages sought herein exceeds the jurisdictional limits of all other courts which would otherwise have jurisdiction.

REQUEST FOR RELIEF

WHEREFORE, Plaintiffs respectfully request judgment against Defendants, awarding compensatory, consequential, exemplary, and punitive damages in an amount to be determined at trial; costs of suit; attorneys' fees; and such other and further relief as the Court may deem just and proper.

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JURY DEMAND

Pursuant to Federal Rule of Civil Procedure 38, Plaintiffs hereby request a trial by jury on all causes of action asserted within this pleading.

Dated: December 13, 2021

Respectfully Submitted,

BOIES SCHILLER FLEXNER LLP

/s/ Richard J. Pocker

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Second Amended Complaint and Jury Demand was served on December 13, 2021 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Shilah Wisniewski
Shilah Wisniewski, an Employee of
Boies Schiller Flexner LLP